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Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

In re:

**VIAGRA (SILDENAFIL CITRATE) AND
CIALIS (TADALAFIL) PRODUCTS
LIABILITY LITIGATION**

Master File No.: 3:16-md-02691-RS

**DECLARATION OF ERNEST CORY
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

This Document Relates to : ALL ACTIONS

I, Ernest Cory, declare as follows:

1. I am an attorney in the law firm of Cory Watson, P.C., lead counsel for Plaintiffs. I have personal knowledge of all the facts contained herein and, if called as a witness, I could and would testify competently thereto.

2. The documents sought to be filed under seal are:

- A. Defendant Pfizer's Partially Privileged Document Log;
- B. Defendant Pfizer's Completely Privileged Document Log.

3. On July 20, 2017, the undersigned provided the above listed documents to The Honorable Magistrate Judge Sallie Kim in native excel format via e-mail. After receiving the above documents, the Magistrate's Clerk requested that Plaintiffs file this Administrative Motion to File Under Seal. The documents are filed as exhibits to the Joint Letter Brief Regarding Pfizer Documents Withheld as Privileged and Plaintiffs' Request for Random Sampling (ECF Doc.

DECLARATION
3:16-MD-02691-RS

1 535). The only reason Plaintiffs are moving to seal the above documents is because they contain
2 information Defendants designated as confidential pursuant to the Protective Order.

3 I declare under the penalties of perjury under the laws of the United States of America that
4 the foregoing is true and correct.

5 Executed on July 26, 2017, in Birmingham, Alabama.

6 By: 
7 Ernest Cory

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